

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TRACYE CURRIE, Individually)	
And as Surviving Mother and Personal)	
Representative of the Estate of)	
NODIANA ANTOINE, deceased,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	1:05-CV-1610-BBM
CHEVRON U.S.A. INC. and)	
CHEVRON STATIONS INC.,)	
)	
Defendants.)	

SPECIAL VERDICT FORM

The jury is instructed to answer the following questions:

1. Do you find by a preponderance of the evidence that Defendants Chevron U.S.A. Inc. and Chevron Stations Inc. were negligent?

_____ Yes _____ No

Proceed to Question 2.

2. Do you find by a preponderance of the evidence that Defendants Chevron U.S.A. Inc. and Chevron Stations Inc. were negligent per se?

_____ Yes _____ No

If "Yes" to either Question 1 or 2, proceed to Question 3. If "No," STOP HERE and sign this form.

3. Do you find by a preponderance of the evidence that Anjail Muhammad's criminal act was foreseeable to Defendants Chevron U.S.A. Inc. and Chevron Stations Inc.?

_____ Yes _____ No

If "Yes," proceed to Question 4. If "No," STOP HERE and sign this form.

4. Do you find by a preponderance of the evidence that Nodiana Antoine's knowledge of the risk to her safety was equal or superior to that of Defendants Chevron U.S.A. Inc. and Chevron Stations Inc.?

_____ Yes _____ No

If "Yes," STOP HERE and sign form. If "No," proceed to Question 5.

5. If you answered "Yes" to Questions 1-3 and "No" to Question 4, do you find by a preponderance of the evidence that Defendants Chevron U.S.A. Inc.'s and Chevron Stations Inc.'s negligence was a proximate cause of Plaintiff Nodiana Antoine's injuries?

_____ Yes _____ No

If "Yes," proceed to Question 6. If "No," STOP HERE and sign this form.

6. Do you find by a preponderance of the evidence that Plaintiff Nodiana Antoine, by the exercise of ordinary care, could have avoided the consequences caused by Chevron's negligence?

_____ Yes _____ No

If "Yes," STOP HERE and sign form. If "No," proceed to Question 7.

7. Do you find by a preponderance of the evidence that Plaintiff Nodiana Antoine was negligent?

_____ Yes _____ No

If "Yes," proceed to Question 8. If "No," proceed to Question 11.

8. Do you find by a preponderance of the evidence that Plaintiff Nodiana Antoine's negligent conduct was a proximate cause of her injuries?

_____ Yes _____ No

If "Yes," proceed to Question 9. If "No," proceed to Question 11.

9. Please state the amount (as a percentage between 1% and 100%) that Plaintiff Nodiana Antoine's negligence was a proximate cause of her injuries.

Proceed to Question 10.

10. Please list the amount of damages you award to Plaintiff.
- a. wrongful death _____
 - b. pain and suffering _____
 - c. medical expenses and funeral expenses _____

Proceed to Question 11.

11. Do you find by clear and convincing evidence that Chevron's actions showed willful misconduct, malice, fraud, oppression, or that entire want of care which would raise the presumption of conscious indifference to consequences and that punitive damages should therefore be awarded against Chevron?

_____ Yes _____ No

If "Yes," then proceed to Question 12. If "No," STOP HERE and sign this form.

12. Please list the amount of punitive damages you award to Plaintiff.

PLEASE HAVE THE FOREPERSON SIGN AND DATE THIS FORM.

This _____ day of _____, 2006.

Foreperson